

Honorable Tiffany M. Cartwright

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

JENNIFER KRALEY HEINRICH,  
Individually and as limited guardian ad litem  
for A.K.J., a Minor,

Plaintiff,

v.

CASTLE ROCK SCHOOL DISTRICT, a  
Municipal Corporation,

Defendant.

No. 3:23-cv-05945-TMC

STIPULATED MOTION TO ADJUST  
EXPERT DISCLOSURE DEADLINE

**Note on Motion Calendar: August 21,  
2024**

**STIPULATION**

Plaintiff Jennifer Kraley Heinrich, Individually and as limited guardian ad litem for A.K.J., a Minor (“Plaintiff”) by and through their counsel of record, Thad Martin, and Defendant Castle Rock School District (“Defendant”), by and through their counsel of record, Patricia K. Buchanan and Haley E. Moore, stipulate and respectfully move the Court for an order extending the deadline by which the parties must disclose expert opinions pursuant to FRCP 26(a)(2)(B). By Order of this Court (Dkt. No. 14), the deadline to disclose expert opinions is August 26, 2024. The parties jointly request that the Court extend the deadline for expert opinions under FRCP 26(a)(2)(B) to October 26, 2024.

The parties make this request in order to most efficiently and effectively resolve this

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1 matter without the need for trial. The parties currently are set for mediation on August 27,  
2 2024. Allowing the parties additional time and focus of resources to negotiate towards  
3 resolution would promote efficient litigation and hopeful resolution of the issues at bar and  
4 avoid incurring additional cost of potentially unnecessary expert opinions.

5 AGREED AND STIPULATED TO on this 21st day of August, 2024.

6 PATTERSON BUCHANAN  
7 FOBES & LEITCH, INC., P.S.

8 By:   
9 Patricia K. Buchanan, WSBA 19892  
10 Haley E. Moore, WSBA 48076  
11 Attorney for Defendants  
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**ORDER**

THIS CAUSE CAME TO BE HEARD upon the Stipulation of the parties, by and through their respective attorneys of record, seeking to continue the deadline to disclose expert opinions pursuant to FRCP 26(a)(2)(B) from August 26, 2024 to October 26, 2024. The Court finds good cause for extending this deadline and thus the stipulated motion is hereby GRANTED. The deadline to disclose expert opinions pursuant to FRCP 26(a)(2)(B) is October 26, 2024. The parties' trial date and all other deadlines remain unchanged, as set in Dkt. 14.


IT IS SO ORDERED AND ADJUDGED.

Dated this 21st day of August, 2024.

  
\_\_\_\_\_  
TIFFANY M. CARTWRIGHT  
United States District Judge

Presented by:

PATTERSON BUCHANAN  
FOBES & LEITCH, INC., P.S.

By:   
\_\_\_\_\_  
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STIPULATED MOTION TO ADJUST EXPERT  
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